

HHH

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

RECEIVED

AUG 04 2008
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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

William ATKINS

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

08CV4425

JUDGE KENNELLY

MAGISTRATE JUDGE COX

vs.

Case No: _____
(To be supplied by the Clerk of this Court)

DIRECTOR SALVADOR GODINEZ "JOHN DOES"

COUNTY SHERIFF THOMAS J. DART, SUPERVISORY

SUPERINTENDENT GEORGE TUNER "JOHN DOES"

SUPERINTENDENT NELSON "JOHN DOES"

ADMINISTRATION "JOHN DOES" or "JANE DOES"

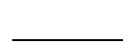
PERSONNEL "JOHN DOES" or "JANE DOES"

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:



COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)



COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)



OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: WILLIAM ATKINS
- B. List all aliases: _____
- C. Prisoner identification number: 2003-0014927
- D. Place of present confinement: COOK COUNTY DEPT OF CORR
- E. Address: 2600 S. CALIFORNIA AVENUE CHICAGO IL 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: SALVADOR GODINEZ. "John Doe"
 Title: DIRECTOR
 Place of Employment: COOK COUNTY OF CORR
- B. Defendant: THOMAS. J. DART
 Title: COOK COUNTY SHERIFF
 Place of Employment: COOK COUNTY OF CORR
- C. Defendant: GEORGE TURNER. "John Doe"
 Title: SUPERINTENDENT
 Place of Employment: COOK COUNTY OF CORR

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

- A. Name: William Atkins
- B. List all aliases: _____
- C. Prisoner identification number: 2003-0014927
- D. Place of present confinement: Cook County Dept of CORR
- E. Address: 2600 S California, Av. Chicago Ill 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: Superintendent NELSON "John Doe"
Title: Superintendent
Place of Employment: Cook County of CORR
- B. Defendant: Administration "John Doe"
Title: Administration
Place of Employment: Cook County of CORR
- C. Defendant: PERSONNEL "John Doe"
Title: PERSONNEL
Place of Employment: Cook County of CORR

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: OTC 2064
Burglary
- B. Approximate date of filing lawsuit: 6/21/07
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: N/A
N/A
- D. List all defendants: OFFICER KEN WALKER
OFFICER LINDA GUTIERREZ
RICHARD A. DEVINE COOK COUNTY
STATES ATT. TERRY HILLARD Police Sgt. C.P.O.
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): COOK COUNTY
- F. Name of judge to whom case was assigned: KENNELLY
- G. Basic claim made: WRONGLY CONVICTED
OF BURGLARY
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): still pending
- I. Approximate date of disposition: 10, 20, 04

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

ALONG WITH ALL OTHER GENERAL POPULATION
 DETAINEES WAS PLACED ON SIX HOUR
 HALF A DAY RESTRICTIVE LOCK-DOWN
 PUNISHMENT. MEANING ONE DAY WE'RE
 SUPPOSE TO COME OUT AT 7:15 AM AND
 LOCK UP AT 1:15 PM FOR THE REST OF THE
 DAY AND THEN THE NEXT DAY COME OUT AT
 3:15 PM AND LOCK UP AT 1:15 PM AND SO
 ON... IN DAY TO DAY ROTATING TOP OF THE TIER
 TO BOTTOM OF THE TIER ~~OR~~ HALF TIER
 DEPENDING ON HOW THE TIER IS MADE
 BUT ON THESE DAYS WE DO NOT COME OUT
 AT THE TIME THAT WE ARE SUPPOSE TO.
 BECAUSE WHEN THE COURT CLERK OFFICERS
 WILL NOT UNLOCK THE CELLS UNTIL THEY FEEL
 LIKE IT, DEPRIVING US OF THE AMOUNT OF
 TIME DUE TO US. THERE IS NO ONE WATCHING
 OR MONITORING WHEN THEY ~~ARE~~ THEY ARE TO

LETTING US OUT. FURTHERMORE PERTAINING
 TO THE RESTRICTIVE PUNISHMENT WE ARE
 PLACED UNDER, WE WERE NOT GIVEN NOTICE
 OR ~~an~~ OPPORTUNITY TO DEFEND AGAINST, OR
 BE HEARD, NEVER INFORMED OF THE REASONS
 WHY OR CHARGED WITH COMMITTING ANY
 INFRACTION TO INCURE SUCH A PUNISHMENT
 NO ONE WAS GIVEN OR RECEIVED A DISCIPLINARY
 TICKET, SO SUCH A SANCTION SHOULD AND COULD
 NOT BE ENFORCED. SUCH DEPRIVATION OR
 RESTRICTION IS IN VIOLATION OF THE DUE PROCESS
 CLAUSE EMBODIED IN THE FIFTH AND FOURTEENTH
 AMENDMENTS TO THE U.S. CONSTITUTION, WHICH
 PROHIBITS FEDERAL AND STATE GOVERNMENT,
 RESPECTFULLY FROM DEPRIVING ANY PERSON OF
 LIFE, "LIBERTY, OR PROPERTY WITHOUT DUE
 PROCESS AND ALSO IN VIOLATION OF THE
 SIXTH AMENDMENT, BY NOT ALLOWING US AS
 PRE-TRIAL DETENUEES PROPER ACCESS TO THE
 "RIGHT TO COUNSEL" AND TO BE INFORMED
 OF ANY CHARGES, ALLEGATIONS, COMPLAINTS,
 OR OF "MADE-UP" COMPELLING SANCTIONS TO
 BE USED TO FABRICATE A COMPELLING

NECESSITY THAT WAS USED TO PLACE US AS A WHOLE ON RESTRICTIVE, DEPRIVING, PUNISHMENT, WITHOUT BEING FOUND GUILTY OF ANY COOK COUNTY DEPARTMENT OF CORRECTIONS RULES AND REGULATIONS OR PENALIZE FOR INFRACTIONS WHICH WAS AND IS THE BASIS OF AND PURPOSE OF A SEGREGATION OR PENALIZED FOR INFRACTIONS WHICH WAS AND IS THE BASIS OF AND PURPOSE OF A SEGREGATION UNIT OR WINGS, WHICH WAS ESTABLISHED FOR DETAINEEES WHO VIOLATE OR BREAK THE RULES OF THE JAIL OR COMMIT INFRACTIONS, AND THE BASIS OF THIS NEW TYPE OF RESTRICTIVE LOCK-DOWN WAS FIRST INTRODUCED AS A LEVEL SYSTEM IN WHICH DETAINEES HOUSED IN A.B.O. OR S.I. (ABNORMAL BEHAVIOR OBSERVATION OR SPECIAL INCARCENTIAL) WHO POSE AS AN EMINENT THREAT TO THE SECURITY OR OPERATIONS, OR FOR THE DETAINEES EMINENT SAFETY FROM GENERAL POPULATION, "TO JUST PUNISH US BECAUSE OF UNDER STAFFING, OR TO DETER DETAINEES FROM COMING BACK, OR BECAUSE YOU ONLY WANT UP TO 24 DETAINEES IN THE DAY ROOM EACH SHIFT IS NOT THE PROPER FUNCTION OF THIS ADMINISTRATION, AND IS NOT AN ANSWER OR A SOLUTION, AND IS AN "ABUSE OF POWER" POSED ON THE DETAINEES BY THE ADMINISTRATION. WE ARE NOT CONVICTS TO BE PUNISHED IN THIS MANNER OR FASHION JUST BECAUSE THE DIRECTOR R. SALVADOR GODINEZ, AND SHERIFF THOMAS J. DART AND -

SUPERINTENDENT GEORGE TUNER OF THE COOK COUNTY JAIL DOES NOT UNDERSTAND THE DIFFERENCE BETWEEN CONVICTED FELONS AND PRE-TRIAL DETAINEES. WHICH THIS ADMINISTRATION UNDER DIRECTOR GODINEZ ARE HAVING A PROBLEM COMPREHENDING RESPECTFULLY. MORE CONTACT AND COMMUNICATION WITH ONE'S ATTORNEY, AND WITH OTHERS SUCH AS INVESTIGATORS, OR PERSONS WHO MAY BE DEFENSE WITNESSES OR HELP LOCATE WITNESSES THEREFORE HAVE A "MUCH GREATER NEED" FOR THE TIME IT TAKES FOR CONTACT WITH FAMILIES AND FRIENDS TO DEAL WITH THE UNEXPECTED CRISES, TO TRY TO GET A LAWYER OR TRY TO ARRANGE FOR BAIL, AND THESE PEOPLE ARE NOT ALWAYS AVAILABLE AT THE RESTRICTIVE TIMES WE ARE BEING UNJUSTLY TO. THIS VIOLATION AND DEPRIVATION WOULD UNFAIRLY IMPAIR US OF OUR RIGHT TO PREPARE AN ADEQUATE DEFENSE AND GREATLY US OF OUR CONSTITUTIONALLY PROTECTED LIBERTY OF THE RIGHT TO COUNSEL AND IMPAIR US OF REASONABLE TELEPHONE ACCESS" TO PREPARE FOR OUR DEFENSE. IT WILL HAVE A DETRIMENTAL HEALTH AND BIOLOGICAL ON OUR SLEEPING HABITS. TRYING TO COMING OUT ONE MORNING AND NOT THE NEXT MORNING DAY AFTER DAY WILL CAUSE DETRIMENTAL BIOLOGICAL STRESS TO OUR RHYTHMIC PHYSIOLOGICAL ACTIVITIES OR OUR BIOLOGICAL CLOCKS) WHICH WILL EVENTUALLY

EVENTUALLY CAUSE MENTAL HEALTH

PROBLEMS OVRR AN EXTENDED PERIOD OF TIME
WHICH RESULTS TO CRUEL AND UNUSUAL
PUNISHMENT. EVERY DAY DETAINEES ARE A LOCK UP
LOCK-DOWN UNIT AND FOR PERSONNEL A HOUR AND A
HALF EVERY DAY FOR THERE LUNCH BREAK.

Now Comes "Count 2[#] AMENDMENT"
STRIP SEARCH

DETAINEES ARE BEING STRIP SEARCH ANY AND
EVERY WHERE IN THE GYM ROOM AND THE HALLWAYS
ON THE DECK AND IN THE SHOWERS WHEN NO ONE
HAVE DID ANYTHING. GERMS & FUNGUS ON YOUR FEET
FROM WHERE THEY (STRIP SEARCH) AT. FROM DIV-1 TO
DIV 9. AND DIV. 10 THEY CAN NOT JUSTIFY EACH STRIP
SEARCH THE HAVE FEMALE GUARDS LOOK AT MALE
INMATES THERE IS NO BLINDS THEY STRIP 48
AT ONE TIME TOGETHER OR 24 AT ONE TIME. THEY JUST
RUN IN AT 1-2 A:M 3-11 P:M OR 7-3 A:M
DOING THE TIME YOU IN YOUR CELL OR OUT. THIS IS
UNCONSTITUTIONAL UNDER THE FOURTH & AND
EIGHTH AMENDMENT. IT IS INFECTED WITH RATS AND
ROACHES

WST
"William Atkins"

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

the plaintiff Requests Compensation for
Each Court and on each Constitution Rights
that have been violated and all Amendments
Amendment complaints to this claim
and Back to the Constitutionally Guided.

VI. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 5 day of 22, 208

Wm William Atkins

(Signature of plaintiff or plaintiffs)

William Atkins

(Print name)

2003-0014927

(I.D. Number)

2600 S California Avenue

U.D. P.O Box 089002

Chicago Ill 60608

(Address)

Part-A / Control #: X

Referred To: _____

☐ Processed as a request.

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: ATHINIS First Name: WILLIAMID #: 2003-0014927 Div.: 1 Living Unit: H.1 Date: 3/1/07

BRIEF SUMMARY OF THE COMPLAINT: ALONG WITH ALL OTHER GENERAL POPULATION DETAINEES, WAS PLACED ON SIX HOUR A DAY RESTRICTIVE LOCK-DOWN PUNISHMENT MEANING ONE DAY WE'RE SUPPOSE TO COME OUT AT 7:15 AM AND LOCK UP AT 1:15 PM FOR THE REST OF THE DAY AND THEN THE NEXT DAY COME OUT AT 3:15 PM AND LOCK UP AT 9:15 PM AND SO ON. ~~KNOWING~~ WE ARE DETAINEES WE ARE NOT CONVICTS THIS IS A VIOLATION OF THE RIGHT FIRST AMENDMENT UNDER DUE PROCESS PEOPLE WHO NOT BEEN CONVICTED OF CRIMS PENDING CANNOT BE PUNISHED AT ALL ALL THE DETAINEES DIRECTOR SIVDER GORDINEZ TONY DART NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT: SUPERINTENDENT JOELSON TO BE LET OUT ON THE HOURS DO TO US THIS IS IN VIOLATION OF ACTION THAT YOU ARE REQUESTING: THE SIXTH THE FIFTH AND THE FOURTEENTH AMENDMENTS TO THE U.S. CONSTITUTION.

DETAINEE SIGNATURE: Mr William Athinis

C.R.W.'S SIGNATURE: _____

DATE C.R.W. RECEIVED: 1/1/07

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form. All appeals must be made in writing and directly submitted to the Superintendent.

Part-A / Control #: X

Referred To: _____

☐ Processed as a request.

COOK COUNTY DEPARTMENT OF CORRECTIONS DETAINEE GRIEVANCE

Detainee Last Name: ATKINS First Name: William

ID #: 2003-0014927 Div.: 9 Living Unit: 2.C Date: 6/21/07

BRIEF SUMMARY OF THE COMPLAINT: THIS IS MY 2TH GRIEVANCE
ABOUT GENERAL POPULATION DETAINEES STILL
ON LOCK-DOWN FOR 26 HOURS EVERY OTHER DAY
THIS IS A VIOLATION OF MY RIGHTS DEPRIVING OF
LIFE, LIBERTY WITHOUT DUE PROCESS IN VIOLATION
OF THE FIRST AMENDMENT UNDER DUE PROCESS CLAUSE, FOURTH
WHICH HAVE NOT BEEN CONVICTED OF CRIMES PENDING, AND
THE FIFTH, SIXTH, AND THE FOURTEENTH AMENDMENTS
EVERY TIME I FILE A GRIEVANCE I DO NOT GET TO HEAR IT
AND I ALWAYS GET MOVED TO A OTHER DIV. I WAS
IN DIV. 1 NOW I AM IN DIV 9 AND UNDER THE ADMINISTRATION
SUPERINTENDENT TURNER AND ALL THE DETAINEES, DIRECTOR
 NAME OF STAFF OR DETAINEE(S) HAVING INFORMATION REGARDING THIS COMPLAINT: GODINEZ

ACTION THAT YOU ARE REQUESTING: WE SHOULD BE ALLOWING TO BE
RELEASED FROM C.R. COMPENSATION

DETAINEE SIGNATURE: William Atkins

C.R.W.'S SIGNATURE: _____

DATE C.R.W. RECEIVED: _____

Please note: Decisions of the "Detainee Disciplinary Hearing Board" cannot be grieved or appealed through the use of a grievance form.
 All appeals must be made in writing and directly submitted to the Superintendent.

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS

State of Illinois

County of Cook

Affidavit

I William Atkins Being first duly sworn

on oath, do swear under penalty of perjury that the following statements are exact and true to the best of my knowledge.

① I am the Plaintiff in this case and I have been violated of my constitution rights. I am PRE-TRIAL Detainee ON March 14 2007 All the way up to 2008 some time going in to the end of the year. We was lock-down 26 HOUR Every other Day. Before then up to HALF and HALF.

② HALF of the 48 Come out, Detainee and the other half Come out Each Get 3 hours doing the Day and 3 hour At Night AND we still get lock-down for there **LUNCH** Break so that mean that we will only get A. HOUR & A 1/2 Every other Day.

3) this is a lock-down punishment they had to use out at 7:15 AM and lock at 1:15 PM for the rest of the day and then the next day come out at 3:15 P.M. 26 Hour.

4) Plaintiff was not given notice or an opportunity to defend against or informed of the reasons why or charged with committing any infraction to induce such a punishment no one was give or received a disciplinary ticket.

5) this is ~~in~~ violation of the due process clause embodied in the Fifth and Fourteenth Amendments to the U.S. Constitution which prohibits federal and state government. Respectsfully from depriving any person of life, "liberty" or property without due process.

6) And also in violation of the Sixth Amendment by not allowing us as pre-trial detainees proper access to the "Right to Counsel and to be informed of our charges. Allegations, Complaints, or of mad-up compelling sanctions to be used to fabricate a compelling necessity. that was used to place us as a whole on Restrictive Depriving. Punishment without being found guilty of any County Department of Corrections Rules.

- 7) This sanction has effected various other problems within the Daily operations like deprivation of religious service because we are not being permitted out when it's called.
- 8) this same problem is happening with Recreation Gym. Barber Shop. and Commissary they lock us ~~up~~ up to give us that, and call us out one by one to give it to us ~~up~~ - etc..
- 9) Infringement of our right to practice our Religion is a violation of our First Amendment. Under Due Process Clause people who have not been convicted of crimes pending can not be punished.
- 10) Furthermore this sanction either made by Director Salvador Guzel and Cook County Sheriff Thomas J. Dant. or Superintendent Nelson or Superintendent Turner. Superintendent George Turner. Administration Personnel.
- 11) plaintiff states they invoke and Results to cruel and unusual punishment which is also a violation of the Eighth Amendment of our Constitution, and Abuse of power by this Administration or who ever is responsible therefore I am requesting that this **unjust**,

12] unconstitutional Restrictive Punishment Sanctioned by this Administration Be Reversed in Accordance and Back to the constitutionally guided and protected Procedures.

13] this is A Violation of the Due Process Clause embodied in the Fifth and Fourteenth Amendments to the U.S. Constitution, which Prohibits FEDERAL AND STATE GOVERNMENT RESPECTFULLY FROM DEPRIVING ANY PERSON OF LIFE, "LIBERTY" OR PROPERTY WITHOUT DUE PROCESS.

12] AND ALSO VIOLATION OF THE SIXTH AMENDMENT, BY PROPER ACCESS TO THE "RIGHT TO COUNSEL, AND TO BE INFORMED OF ANY CHARGES, ALLEGATIONS, COMPLAINTS, OR "MADE-UP." IS A VIOLATION OF OUR FIRST AMENDMENT CLAUSE, PEOPLE WHO HAVE NOT BEEN CONVICTED OF CRIMES PENDING CANNOT BE PUNISHED, AND THE EIGHTH AMENDMENT ABUSE OF POWER. THE PLAINTIFF REQUESTS COMPENSATION FOR HUMILIATION AND MENTAL ANGUISH AND SUFFERING

15] Mr William Atkins

Signed before me on this 5/22 day of 22 2008.

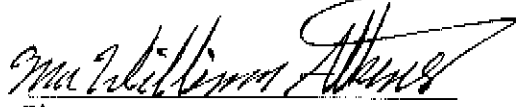
Notary Seal

15] Mr William Atkins

Notarized under and by 735 ILCS
5/1-109. under penalty of perjury

Notarized under and by 735 ILCS
5/1-109, under penalty of perjury,
this 5 day of 22, 08.

Defendant



Signature

William Atkins

ON THE ABOVE DATE, I William Atkins, ALONG WITH ALL OTHER GENERAL POPULATION DETAINEES WAS PLACED ON SIX HOUR HALF A DAY RESTRICTIVE LOCK-DOWN PUNISHMENT. MEANING ONE DAY WE'RE SUPPOSE TO COME OUT AT 7:15am AND LOCK UP AT 1:13pm FOR THE REST OF THE DAY AND THEN THE NEXT DAY COME OUT AT 3:15pm AND LOCK UP AT 9:15pm AND SO ON...IN DAY TO DAY ROTATING TOP OF THE TIER TO BOTTOM OF THE TIER OR HALF TIER DEPENDING ON HOW THE TIER IS MADE. BUT ON THESE DAY WE DO NOT COME OUT AT THE TIMES THAT WE ARE SUPPOSE TO, BECAUSE WHEN THE COUNT CLEARS OFFICERS WILL NOT UNLOCK THE CELLS UNTIL THEY FEEL LIKE IT, DEPRIVING US OF THE AMOUNT OF TIME DUE TO US. THERE IS NO ONE WATCHING OR MONITORING WHEN THEY ARE TO LETTING US OUT. FURTHERMORE PERTAINING TO THE RESTRICTIVE PUNISHMENT WE ARE PLACED UNDER, WE WERE NOT GIVEN NOTICE OR AN OPPORTUNITY TO DEFEND AGAINST, OR BE HEARD, NEVER INFORMED OF THE REASONS WHY OR CHARGED WITH COMMITTING ANY INFRACTION TO INDUCE SUCH A PUNISHMENT. NO ONE WAS GIVEN OR RECEIVED A DISCIPLINARY TICKET, SO SUCH A SANCTION SHOULD AND COULD NOT BE ENFORCED, SUCH DEPRIVATION OR RESTRICTION IS IN VIOLATION OF THE DUE PROCESS CLAUSE EMBODIED IN THE FIFTH AND FOURTEENTH AMENDMENTS TO THE U.S. CONSTITUTION, WHICH PROHIBITS FEDERAL AND STATE GOVERNMENT, RESPECTFULLY FROM DEPRIVING ANY PERSON OF LIFE, "LIBERTY", OR PROPERTY WITHOUT DUE PROCESS, AND ALSO IN VIOLATION OF THE SIXTH AMENDMENT, BY NOT ALLOWING US AS PRE-TRIAL DETAINEES PROPER ACCESS TO THE "RIGHT TO COUNSEL", AND TO BE INFORMED OF ANY CHARGES, ALLEGATIONS, COMPLAINTS, OR OF "MADE-UP" COMPELLING SANCTIONS TO BE USED TO FABRICATE A COMPELLING NECESSITY, THAT WAS USED TO PLACE US AS A WHOLE ON RESTRICTIVE, DEPRIVING, PUNISHMENT, WITHOUT BEING FOUND GUILTY OF ANY COOK COUNTY DEPARTMENT OF CORRECTIONS RULES AND REGULATIONS OR PENALIZED FOR INFRACTIONS WHICH WAS AND IS THE BASIS OF AND PURPOSE OF A SEGREGATION UNIT OR WINGS, WHICH WAS ESTABLISHED FOR DETAINEES WHO VIOLATE OR BREAK THE RULES OF THE JAIL OR COMMIT INFRACTIONS, AND THE BASIS OF THIS NEW TYPE OF RESTRICTIVE LOCK-DOWN WAS FIRST INTRODUCED AS A LEVEL SYSTEM IN WHICH DETAINEES HOUSED IN A.B.O. OR S.I. (ABNORMAL BEHAVIOR OBSERVATION OR SPECIAL INCARCERATION) WHO POSE AS AN EMINENT THREAT TO THE SECURITY OR OPERATIONS, OR FOR THE DETAINEES EMINENT SAFETY FROM GENERAL POPULATION. "TO JUST PUNISH" US BECAUSE OF UNDER STAFFING, OR TO DETER DETAINEES FROM COMING BACK, OR BECAUSE YOU ONLY WANT UP TO 24 DETAINEES IN THE DAYROOM EACH SHIFT IS NOT THE PROPER FUNCTION OF THIS ADMINISTRATION, AND IS NOT AN ANSWER OR A SOLUTION, AND IS AN "ABUSE OF POWER" POSED

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ON THE DETAINEES BY THE ADMINISTRATION. WE ARE NOT CONVICTS TO BE PUNISHED IN THIS NATURE OR FASHION JUST BECAUSE THE DIRECTOR, SHERIFF, OR SUPERINTENDENT OF THE COOK COUNTY JAIL DOES NOT UNDERSTAND THE DIFFERENCE BETWEEN CONVICTED FELONS AND PRE-TRIAL DETAINEES. WHICH THIS ADMINISTRATION UNDER DIRECTOR GODINEZ ARE HAVING A PROBLEM COMPREHENDING RESPECTFULLY. BECAUSE DETAINEES ALL HAVE PENDING CRIMINAL CASES AND ARE PENDING TRIAL GENERALLY REQUIRES MORE CONTACT AND COMMUNICATION WITH ONE'S ATTORNEY, AND WITH OTHERS SUCH AS INVESTIGATORS, OR PERSONS WHO MAY BE DEFENSE WITNESSES, OR HELP LOCATE WITNESSES THEREFORE HAVE A "MUCH GREATER NEED" FOR THE TIME IT TAKES FOR CONTACT WITH FAMILIES AND FRIENDS TO DEAL WITH THE UNEXPECTED CRISES, TO TRY TO GET A LAWYER OR TRY TO ARRANGE FOR BAIL, AND THESE PEOPLE ARE NOT ALWAYS AVAILABLE AT THE RESTRICTIVE TIMES WE ARE BEING UNJUSTLY SUBJECTED TO. THIS VIOLATION AND DEPRIVATION WOULD UNFAIRLY IMPAIR US OF OUR RIGHT TO PREPARE AN ADEQUATE DEFENSE AND GREATLY CRIPPLE US OF OUR CONSTITUTIONALLY PROTECTED LIBERTY OF THE RIGHT TO COUNSEL, AND IMPAIR US OF REASONABLE (TELEPHONE) "ACCESS" TO PREPARE FOR OUR DEFENSE.

IT WILL ALSO HAVE A DETRIMENTAL HEALTH AND BIOLOGICAL EFFECT ON OUR SLEEPING HABITS, TRYING TO ADAPT TO COMING OUT ONE MORNING, AND THEN NOT COMING OUT THE NEXT MORNING, DAY AFTER DAY WILL CAUSE DETRIMENTAL BIOLOGICAL STRESS TO OUR RHYTHMIC PHYSIOLOGICAL ACTIVITIES OR OUR (BIOLOGICAL CLOCKS), WHICH WILL EVENTUALLY CAUSE "MENTAL HEALTH" PROBLEMS OVER AN EXTENDED PERIOD OF TIME WHICH RESULTS TO CRUEL AND UNUSUAL PUNISHMENT.

THIS SANCTION HAS ALSO EFFECTED VARIOUS OTHER PROBLEMS WITHIN THE DAILY OPERATIONS LIKE A DEPRIVATION OF RELIGIOUS SERVICE BECAUSE WE ARE NOT BEING PERMITTED OUT WHEN IT'S CALLED. THIS SAME PROBLEM IS HAPPENING WITH RECREATION, GYM, BARBER SHOP, COMMISSARY etc.. INFRINGEMENT OF OUR RIGHT TO PRACTICE OUR RELIGION IS A VIOLATION OF OUR FIRST AMENDMENT.

UNDER DUE PROCESS CLAUSE, PEOPLE WHO HAVE NOT BEEN CONVICTED OF CRIMES PENDING CAN NOT BE PUNISHED AT ALL. (SEE: CITY OF REVERE V. MASSACHUSETTS GENERAL HOSPITAL 463 U.S. 239, 244, 103 S. CT. 2979).

FURTHERMORE THIS SANCTION EITHER MADE BY DIRECTOR SALVADOR GODINEZ, COOK COUNTY SHERIFF TOM DART, OR SUPERINTENDENT GEORGE TUNER INVOKES AND RESULTS TO CRUEL AND UNUSUAL PUNISHMENT WHICH IS ALSO A VIOLATION OF THE EIGHTH AMENDMENT OF OUR CONSTITUTION, AND AN ABUSE OF POWER BY THIS ADMINISTRATION OR WHO EVER IS RESPONSIBLE. THEREFORE I AM REQUESTING THAT THIS UNJUST,

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UNCONSTITUTIONAL RESTRICTIVE PUNISHMENT SANCTIONED BY THIS ADMINISTRATION BE REVERSED
IN ACCORDANCE, AND BACK TO THE CONSTITUTIONALLY GUIDED AND PROTECTED PROCEDURES.

PLEASE BE GUIDED ACCORDINGLY

RESPECTFULLY SUBMITTED

William Atkins
WILLIAM ATKINS